

Site Remediation Reform

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Assistant Commissioner
Site Remediation Program

Temporary licenses

- Application and Annual Fees on website now
- [http://www.nj.gov/dep/srp/srra/l srp/application .htm](http://www.nj.gov/dep/srp/srra/l srp/application.htm)
- Approximately 120 applications in house
- 65 approved
- 25 paid fee and are now temporary LSRPs
- Need to be temporary LSRP to be nominated as an LSRP board member

The Board

- 13 members – Commissioner, State Geologist, Academia, Business, 3 environmentalist (1 is LSRP), 6 LSRPs.
- Interest? - Go to Governor's website for Boards and Commissioners at:
- <http://www.state.nj.us/governor/boards>
- Governor's Office will provide applicant with appropriate questionnaires and forms

Interim SRRA Rules

- Effective upon filing November '09 - effective for 18 months, no public comment period
- Published in December register
- Considering operative dates for some components in the rule; permits, mandatory timeframes.
- Grace Period changes
 - Modifying list of potential violations
 - Increasing the # of “non-minor” violations
 - Submittals are key to mandatory timeframes

Extension of Mandatory and Regulatory Timeframes

- Mandatory “shalls” in statute
- Some regulatory will be deemed approved if you certify you meet specific conditions in rule
- Extensions for regulatory can not result in non-compliance with Mandatory Timeframes
- DEP can always deny the extension
- Others need DEP prior approval

Initiating Remediation – “New Cases”

- Section 30(b): 180 days after enactment, anyone **initiating remediation** needs an LSRP; and complies with 1-9.
- New discharges, notification of an ISRA event, new PA,SI,RI,RAW,RAR (key document) which creates a new case in NJEMS, case with existing NFA which is reopened, key document for existing case that never submitted any information, new property owner, new deed notice or declaration of environmental restriction.
- Not a “new case” if you pass two prong test:
 - Reported the original discharge/discovery of contamination as required by law, AND
 - Have continuously remediated the site since then.

New cases

- DEP will consider the sale of a property, which is undergoing remediation, to a new entity that will assume responsibility a “new case”.
- LSRP will be required.
- However, the clock will not “restart” for mandatory timeframes that have not yet been achieved. New party must meet existing timeframes.

New cases

- Some new cases will have case manager assigned based on criteria in Section 21; case manager will decide reviews
- All other new cases will go through the new review process
- DEP is still evaluating how it will process cases and communicate the results of our reviews to LSRPs and persons conducting remediation
- New annual fees will apply unless case manager assigned for the entire site

Existing cases

- Same traditional oversight process unless you opt into the new paradigm
- Same oversight costs/direct billing
- Mandatory timeframes supersede ACO/RA timeframes
- ACO timeframes may still apply unless trumped by Mandatory timeframe or Regulatory timeframe

Section 30 – “Opting in”

- Anyone who wants to volunteer before 3 years.
- Comply with Sec. 30(a) 1-3 plus the 4-9.
- Process to opt in will be a request to DEP via a standardized form
- Current thinking – DEP will be saying yes, with limited exceptions, such as outstanding oversight costs

Stop Work Points

- LSRP/RP must communicate with DEP before proceeding with remediation under these conditions:
 - IEC conditions
 - Alternative Presumptive Remedy
 - Alternative or site-specific remediation standard that requires modeling
 - Bringing contaminated materials to a site above what is needed for grading.
 - Landfill closures and disruptions
 - Selection of a remedial action that will render the property unuseable.

Remediation Certifications

- Replaces ISRA Remediation Agreements which allow ISRA triggering event to occur prior to NFA/RAO or Remedial Action Workplan approval.
- DEP will not issue Amendments to existing RA or ECRA ACOs; Changes will require a RC
- No new RA's will be issued after November 2nd.
- RC application will be on web this week.

New Site Remediation Permits

- Issued whenever Institutional or Engineering Controls are utilized
- 2 types:
 - Soil Remedial Action Permit – Issued for deed notice or caps
 - Ground water Remedial Action permit – Issued for:
 - Ground Water Natural Attenuation
 - Ground Water Pump and Treat

New Site Remediation Permits

- Permits for ground water will be issued after initial monitoring confirms “success” with treatment or Natural Remediation
- RAO can be issued at this point and the permit will be used to ensure groundwater cleanup
- Permit can be reopened if cleanup unsuccessful
- Annual fee

New Site Remediation Permits

- DEP will start issuing Remedial Action permits January 2010
- Biennial Certification requirements still apply
- They will be incorporated in permits for new cases
- As Biennial Certs come due for existing cases they will be converted to permits
- Conversion of all Biennial Certs will occur as part of the final rule

RAO and Covenant Not to Sue

- DEP will no longer issue NFAs;
- Exceptions:
 - Unregulated heating oil tanks
 - Interim period for DEP oversight cases until 2012
- RAO is equivalent to NFA
- DEP can invalidate if an RAO is un-protective
- DEP has 3 years to audit
- DEP can not issue RAOs

RAO and Covenant Not to Sue

- DEP can no longer issue Covenant Not to Sue once first licenses are issued
- CNS is deemed to apply “by operation of law” once RAO is issued
- Problem – NFAs issued by DEP over the next 3 years will not have CNS language and statutory CNS operational clause does not apply to NFAs
- CNS can be revoked by “operation of law” if RAO invalidated or property is not in compliance with RAO

New Guidance Documents

- Some administrative, some technical
- Second category requires stakeholder input
 - Immediate Env. Concerns
 - Petroleum Hydrocarbons Cleanups/Analysis
 - RAOs
 - Vapor Intrusion Guidance changes
 - Contaminated AOC summary
 - Presumptive remedies
 - Rendering property unusable

Other Guidance Documents

- Linear construction projects
- Ecological receptor investigations and standards

LSRPs and Material Reuse Decisions

No DEP involvement (see PDM below)

- Decisions consistent with “Alternative Fill Protocol”
 - “Like-on-like” (contamination and concentration) approach
 - Material is appropriate for anticipated exposure scenarios
 - Volume required to implement the remedial action
 - Volume required to raise elevation above floodplain for redevelopment

DEP involvement

- Departures from “Alternative Fill Protocol”
- Landfill remediation/closure (for closure plan/RAW approval)

“Alternative Fill Protocol” is under revision

Must comply with local/regional requirements (i.e., Pinelands)

PDM use requires ODST approval

SRP
GUIDANCE
ON DEVELOPING
ANNUAL REMEDIATION
FEES

DRAFT DELIBERATIVE

10/22/09

WHY??

- Predictability- budget
- Budget based not Submittal based
- Eliminate “Back and Forth”
- Dedicate limited resources to inspection

WHO IS SUBJECT?

An Annual Remediation Fees is required for every new case that initiates remediation (post November), including those the choose to “Opt-in”.

WHEN??

- The first Annual Remediation Fee is due (9) nine months from initiating remediation or with the first key document whichever is earlier.
- First Annual Remediation Fee is based available information as to the fee category, media impacted and defaults as appropriate (UST, Landfill)
- Subsequent Annual Fees are due every 365 days. Invoicing will occur.

Annual Remediation Fee

- is the fee paid to the Department on an annual basis pursuant to NJAC 7:26C 3.2, that is based on the number of Contaminated Areas of Concern and Contaminated Media Additives at any given site, area of concern or discrete discharge

Contaminated Areas or Concern

- the number of Areas of Concern, pursuant to 7:26E-1, at a contaminated site, where contamination has been confirmed to have impacted soil, shall each constitute a separate unit.

Contaminated Media Additive

- are those impacted environmental media at the site (ground water, surface water, or sediment) that are contamination from any area of concern or site operations. The specific media impacted shall be counted as a discrete fee additive for each media impacted.

Contaminated Media Additives

- Ground Water
- Surface Water Discharge
- Sediment
- Contaminated above the applicable standard from any AOC, or site operations and it has not been demonstrated that the contamination is solely from an off site source.

Developing the Annual fee

Fee Category + Media

- Fee Category I cases: no contamination or single Contaminate AOC (soils only,) Historic Fill.
- Fee Category II cases: 2-10 Contaminated AOC (Reg. UST System, excluding reg. heating oil tanks for onsite consumption)
- Fee Category III cases: 11-20 Contaminated AOC (Landfill)
- Fee Category IV cases: >20 Contaminated AOC

Annual Fee Increases

- At any time during the established annual fee cycle, it is determined that additional Contaminated AOC or Contaminated Media Additives exist, the remediating party must notify the department prior to the end of the Annual Fee cycle. The required increase will be reflected in the new Annual fee [see NJAC 7:26C-3.2];

Annual Fee Decreases

- At any time during the established Annual Fee cycle, a Remediation Action Outcome (RAO) is issued, the remediating party must notify the department prior to the end of the Annual Fee cycle, provide copies of the RAO for the specific AOC(s) or Contaminated Media. The requested reduction will be reflected in the new Annual fee [see NJAC 7:26C-3.2];

Annual vs. Permit Fees

- **NOTE: If a RAO has been issued for all Area(s) of Concern and impacted media and the remaining remediation is being conducted under a Permit, the remediating party will not be required to pay future annual fees, only the existing permit fees as established in NJAC 7:26C-3.2.**

Exceptions/Additions to Annual Fee

- IEC portion of case - Direct Bill + Annual Fee
- Entire case in Direct Oversight or has a case manager - Direct Bill NO Annual fee
- Portion of case in Direct oversight-Direct bill + Annual fee

EXAMPLES

- If you have 10 Contaminated AOC and 1 GW fee additive. The **10 AOC's are cleaned up** for soil, regardless if they impacted GW, your Fee Components would be **0 and 1 GW fee additive**.
- When applying the Categories your fee would be **Category I fee + GW additive fee**

Site Remediation Program

Immediate Environmental Concern Guidance

Ed Putnam, Assistant Director
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Immediate Environmental Concern Guidance

- I. Purpose
- II. Overview
 - IEC Receptor Protection and Source Control
 - IEC Receptor Protection
 - IEC Source Control
- III. Definitions
 - Potable Water IEC
 - Vapor Intrusion IEC
 - Direct Contact IEC
 - Currently Known Extent
- IV. IEC Guidance Procedures
 - A. Potable Water IEC Sites
 - B. Vapor Intrusion IEC Sites
 - C. Direct Contact IEC Sites
- V. Tables
- VI. Attachments
- VI. References

Immediate Environmental Concern Guidance

I. Purpose

- Overall, this IEC guidance is written to aid the person responsible for conducting the remediation, environmental consultants and Licensed Site Remediation Professionals when addressing the more common types of IEC conditions. The requirements for IEC cases apply to the person responsible for conducting the remediation.
- Every IEC case will be assigned to a Case Manager.

Immediate Environmental Concern Guidance

II. Overview

- The person responsible for conducting the remediation usually will identify IEC conditions at known contaminated sites when performing receptor evaluation requirements found in the Technical Regulations at 7:26E-1.12 through 7:26E-1.16.

Immediate Environmental Concern Guidance

II. Overview

- There are the two critical components to remediating an IEC condition: receptor control and source control that are contained in the Technical Regulations, 7:26E-1.11. Both measures have specific timeframes for notification, remedial action and reporting. Receptor control and source control must be completed to close an IEC case.

Immediate Environmental Concern Guidance

II. Overview

IEC Source Control

- The overall goal of source control is to eliminate the cause of the IEC condition so that protection of public health does not have to rely solely on receptor controls.

Immediate Environmental Concern Guidance

III. IEC Definitions

Potable Water

- A potable water IEC is a condition where there is contamination at levels at or above the Class II Ground Water Remediation Standards, N.J.A.C. 7:26D-2.2 in wells used for potable purposes where the contamination is associated with a discharge of a hazardous substance(s).

Immediate Environmental Concern Guidance

Appendix Table 1 - Specific Ground Water Quality Criteria

Specific Ground Water Quality Criteria - Class IIA and Practical Quantitation Levels

Constituent	CASRN	Ground Water Quality Criterion	Practical Quantitation Level (PQL) *	Higher of PQL and Ground Water Quality Criterion (ug/L)*
Acenaphthene	83-32-9	400	10	400
Acetone	67-64-1	6,000	10	6,000
Acetophenone	98-86-2	700	10	700
Acrolein	107-02-8	4	5	5

Immediate Environmental Concern Guidance

III. IEC Definitions

Vapor Intrusion

- A vapor intrusion IEC occurs when a discharge of a hazardous substance results in levels of contaminants in indoor air above Indoor Air Screening Levels in the Department's Vapor Intrusion Guidance.

Immediate Environmental Concern Guidance

Page 1 of 2

TABLE 1
NJDEP MASTER TABLE
GENERIC VAPOR INTRUSION SCREENING LEVELS

March 2007

Chemical	Ground Water Screening Levels µg/L	Soil Gas Screening Levels				Indoor Air Screening Levels			
		Residential		Nonresidential		Residential		Nonresidential	
		µg/m ³	ppbv	µg/m ³	ppbv	µg/m ³	ppbv	µg/m ³	ppbv
METHOD TO-15 PARAMETERS									
Acetone (2-propanone)	1,900,000	160,000	69,000	230,000	97,000	3,300	1,400	4,600	1,900
Benzene	15	16	5	26	8	2	0.5	2	0.5
Bromodichloromethane	5	34	5	34	5	3	0.5	3	0.5
Bromoethene (vinyl bromide)	0.1	22	5	22	5	2	0.5	2	0.5
Bromoform	370	80	8	180	18	5	0.5	5	0.5
Bromomethane (methyl bromide)	29	260	66	360	92	5	1	7	2
1,3-Butadiene (vinyl ethylene)	0.01	11	5	11	5	1	0.5	1	0.5
2-Butanone (methyl ethyl ketone)	2,700,000	260,000	87,000	360,000	120,000	5,100	1,700	7,200	2,400
Carbon disulfide	710	36,000	12,000	51,000	16,000	730	230	1,000	330
Carbon tetrachloride	1	31	5	31	5	3	0.5	3	0.5
Chlorobenzene	640	2,600	550	3,600	780	51	11	72	16
Chloroethane (ethyl chloride)	4	110	41	250	93	2	0.8	5	2
Chloroform	70	24	5	24	5	2	0.5	2	0.5
Chloromethane (methyl chloride)	240	4,700	2,300	6,600	3,200	95	46	130	64
3-Chloropropene (allyl chloride)	0.8	16	5	34	11	2	0.5	2	0.5
2-Chlorotoluene (o-chlorotoluene)	1,200	3,600	700	5,100	990	73	14	100	20
Cyclohexane	1,200	310,000	90,000	430,000	130,000	6,200	1,800	8,700	2,500
Dibromochloromethane	9	43	5	43	5	4	0.5	4	0.5
1,2-Dibromoethane (ethylene dibromide)	0.4	38	5	38	5	4	0.5	4	0.5
1,2-Dichlorobenzene (o)	5,900	7,300	1,200	10,000	1,700	150	24	200	34
1,3-Dichlorobenzene (m)	600	550	91	770	130	11	2	15	3
1,4-Dichlorobenzene (p)	75	30	5	32	5	3	0.5	3	0.5
Dichlorodifluoromethane (Freon 12)	1,000	9,100	1,800	13,000	2,600	180	37	260	52
1,1-Dichloroethane	3,600	26,000	6,300	36,000	8,800	510	130	720	180
1,2-Dichloroethane	2	20	5	20	5	2	0.5	2	0.5
1,1-Dichloroethene	250	11,000	2,800	15,000	3,900	220	55	310	77
** 1,2-Dichloroethene (cis)	350	1,800	460	2,600	640	36	9	51	13
1,2-Dichloroethene (trans)	300	3,600	920	5,100	1,300	73	18	100	26
1,2-Dichloroethene (total)*	190	1,600	410	2,300	580	33	8	46	12
1,2-Dichloropropane	1	23	5	23	5	2	0.5	2	0.5
1,3-Dichloropropane (total)*	1	31	7	72	16	2	0.5	2	0.5
Ethylbenzene	61,000	53,000	12,000	74,000	17,000	1,100	240	1,500	340
Hexachlorobutadiene	1	53	5	53	5	5	0.5	5	0.5

Immediate Environmental Concern Guidance

III. IEC Definitions

Direct Contact

- A direct contact IEC is a situation where contamination exists above the acute health effect levels in the upper two feet of the soil column and there is actual or a potential for human contact via dermal contact, ingestion or inhalation. Acute effect means that an adverse human health impact could result from an exposure of less than two weeks.

Immediate Environmental Concern Guidance

- “Approximately one hour following the site visit, a staff member noticed his shoes felt “uneven.” Upon inspection, it was observed that the bottom soles of both shoes had disintegrated.”



Immediate Environmental Concern Guidance Timeframes

- Notification -3 days
- Initial Mitigation – 5 days
- Receptor control -30 days
- Receptor report -90 days
- Initiate source control – 6 months
- Mandatory timeframe for initiating source control 1 year.

Remedial Actions That Render Property Unusable

Workgroup Members

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A stylized, layered mountain range graphic in shades of teal and blue, located in the bottom right corner of the slide.

Remedial Actions That Render Property Unusable

SRRA Section 47g (1):

“The department may disapprove the selection of a remedial action for a site on which the proposed remedial action will render the property unusable for future redevelopment or for recreational use.”

A stylized silhouette of a mountain range in shades of teal, located in the bottom right corner of the slide.

Remedial Actions That Render Property Unusable

- ◆ Permanent fencing or barriers that preclude access
- ◆ Treatment systems (wells and associated plumbing) that occupy greater than 20% of the developable land
- ◆ Interred material or containment systems that present structural challenges/ impediments for greater than 20% of the developable land
- ◆ Remedial actions that result in 30% or greater slope over 20% or more of the developable land

Remedial Actions That Render Property Unusable

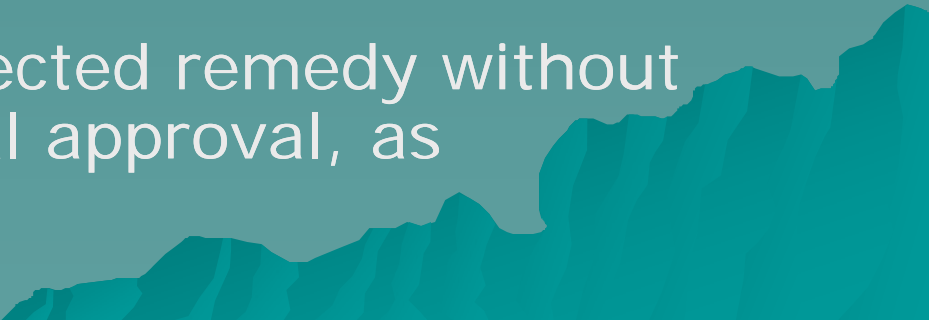
- ◆ Remaining levels of contamination that impose regulatory limitations on site reuse, such as PCB contamination as subject to the federal TSCA, or radioactive materials
- ◆ Remaining physical hazards such as munitions and explosives of concern (MEC)
- ◆ Conditions that would result in an IEC if the property is developed including, but not limited to, vapor intrusion issues that cannot be addressed with engineering controls, and acute contaminant concentrations

Remedial Actions That Render Property Unusable

- ◆ LSRPs will certify for each RAO that the selected remedial action does not preclude or substantially restrict the use of a site for future redevelopment or for recreational use.
- ◆ If, in the opinion of the LSRP, a proposed remedy will render the property unusable...

Remedial Actions That Render Property Unusable

The LSRP will...

- ◆ notify the department, and municipality and/or regional authority, as appropriate
 - ◆ participate in a public hearing to discuss the proposed remedial action should an elected or appointed official request a hearing
 - ◆ not proceed with the selected remedy without municipal and/or regional approval, as appropriate
- 
- A stylized silhouette of a mountain range in shades of teal, located in the bottom right corner of the slide.

Remedial Actions That Render Property Unusable

The department will...

- ◆ review all remedial actions that render a property unusable for future redevelopment or recreational use

The department may...

- ◆ invalidate an RAO that renders a property unusable for future redevelopment or recreational use without municipal or regional authority approval

Guidance for the Issuance of Response Action Outcomes (RAO)

By Kevin F. Kratina, Chief
Bureau of Underground Storage Tanks

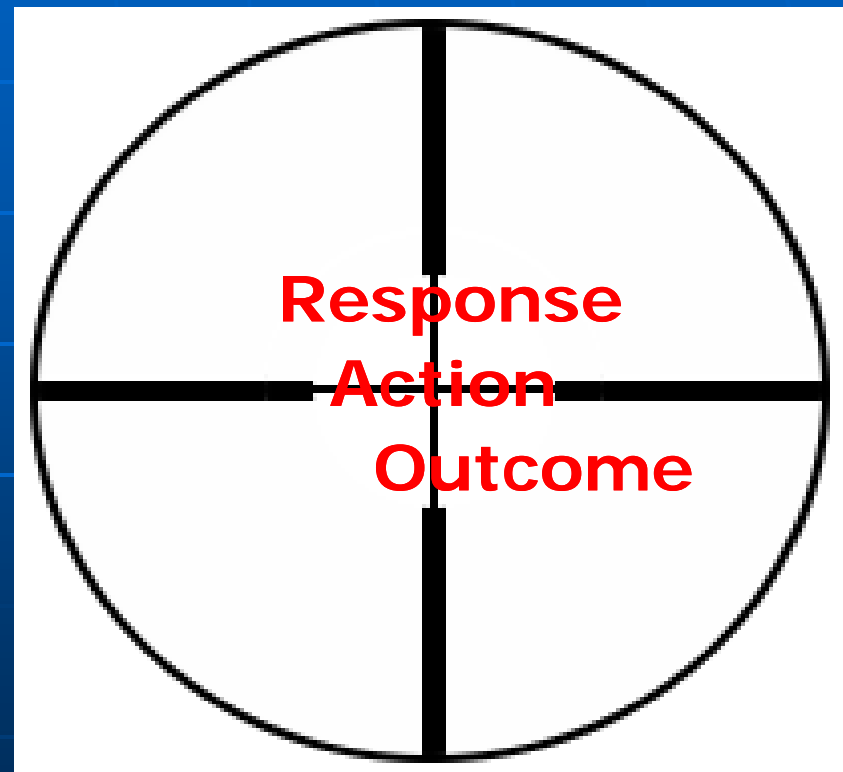
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Today's Presentation

- What is a RAO?
- Define the different RAO Variations
- Who are RAOs issued to?
- When is a RAO issued?
- How is a RAO prepared and structured?

Site Remediation Reform Act – Section 2 and 14

- SRRRA added RAO as the new target
- RAOs and NFAs Collectively known as “Final Remediation Documents”



Location being Remediated

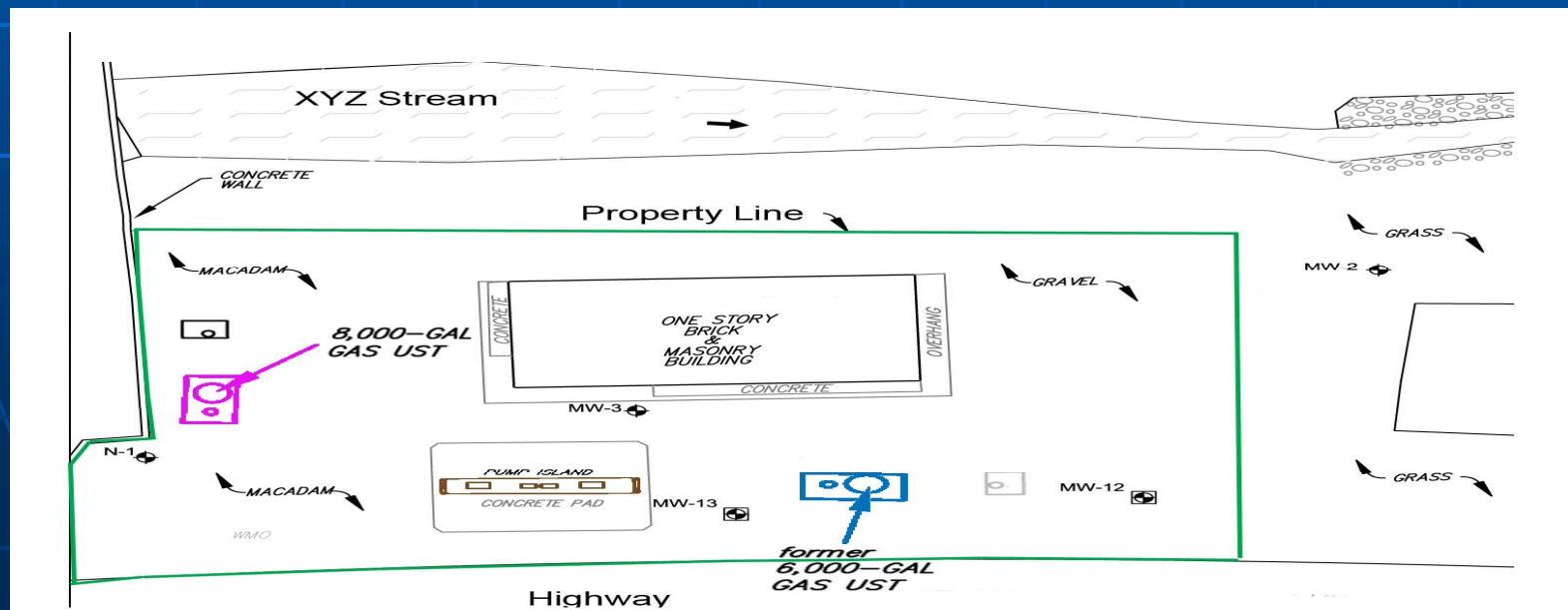
Entire Site

vs.

Area of Concern

Entire Site

Entire Site - The entire parcel subject to remediation. Includes any contamination within that subject parcel and where ever those contaminants have migrated on site or off site, regardless of media impacted.



Area of Concern

- Location of any contamination and where ever those contaminants have migrated on site or off site, regardless of media impacted.



What is a RAO?

LSRP's written professional opinion that the location was remediated in accordance with applicable statutes, regulations and guidance, based on historical use of the site or Area of Concern (AOC), that:

1. There are no* contaminants at a "site" or "AOC"; or

*Notes one "exception" as a matter of policy to be covered later

What is a RAO (continued)?

2. Any contaminants present at a site or AOC have been remediated; and
3. Remedial action is protective of public health, safety, and the environment; and
4. All applicable permits have been obtained.

Response Action Outcome Variations

Factors to Consider:

- 1) Scope of Remediation – Determined by regulation, oversight document, person conducting the remediation and identified discharges. (i.e. ISRA covers the entire “Industrial Establishment”; UST Regs. cover the regulated UST System; Spill Act covers all discharges)

Response Action Outcome Variations

Scope of Remediation (cont.)

Results in either:

Entire Site RAO – Always based on the completion of a Preliminary Assessment at a minimum; or

Area of Concern RAO – anything less than an Entire Site RAO. An AOC RAO can be issued while an “Entire Site” cleanup proceeds

Response Action Outcome Variations

Factors to Consider (cont.):

2) Extent of Remediation –

Determined by whether applicable remediation standards\criteria have been met, or if institutional and engineering controls, or an institutional control alone, have been used as part of the remediation.

Response Action Outcome Variations

Extent of Remediation

Results in either:

Unrestricted Use RAO – Most stringent remediation standards\criteria met; or

Limited Restricted Use RAO – Institutional Control (IC) only used as part of the remediation (i.e. CEA)

Restricted Use RAO – IC and Engineering Control used as part of the remediation

Response Action Outcome Variations

Six different RAOs

For an Area of Concern

- Unrestricted
- Limited Restricted
- Restricted

For an Entire Site or ISRA Industrial Establishment

- Unrestricted
- Limited Restricted
- Restricted

Who are RAOs Issued To? SRRRA Section 14

“..To the person(s) conducting the remediation....”

When is a RAO Issued?

- After the “entire site” or “AOC” have been remediated in accordance with applicable statutes, rules and regulations protective of public health, safety and the environment.”

(Note: Copy simultaneously filed with the Department with 3 electronic copies of remediation related records. Dept. of Children and Families copied on matters involving Child Care Centers)

When is a RAO Issued (Cont.)?

Soil Impacted

- Soil remediated to most stringent Soil Remediation Standards\Criteria – *Unrestricted Use RAO**
- Soil remains > Soil Remediation Standards and requires an institutional control but no engineering control – *Limited Restricted Use RAO***
- Soil remains > Soil Remediation Standards & requires engineering and institutional control – *Restricted Use RAO*

Notes: *Assumes no CEA for GW

**Assumes no engineering control for GW

When is a RAO Issued (Cont.)?

Ground Water (GW) Impacted

- GW remediated to GW Remediation Standards – *Unrestricted Use RAO**
- GW remains > GW Remediation Standards but levels are decreasing (i.e. passes Mann-Whitney**) – Limited Restricted Use *RAO**

*Notes: *Assumes soils remediated to unrestricted use*
*** Assumes GW Remedial Action Permit obtained*

When is a RAO Issued (Cont.)?

Ground Water (GW) Impacted

- GW remains > GW Remediation Standards but levels are low and non-decreasing** – *Limited Restricted Use RAO** if conditions in Attachment 2 – Protective GW Remedies with Non-decreasing Levels of GW Contamination under a Natural Attenuation Remedial Action

Notes: *Assumes soils remediated to unrestricted use

** Assumes GW Remedial Action Permit obtained

When is a RAO Issued (Cont.)? Ground Water (GW) Impacted

- GW remains > GW Remediation Standards requires engineered containment strategy for portion of the plume and decreasing levels** for other portion. – *Restricted Use RAO*

*Notes: ** Assumes GW Remedial Action Permit obtained*

When is a RAO Issued (cont.) & Contamination Remains

1. Contamination migrating onto the site (PA\SI required) – No site contribution;
2. Natural background;
3. Contamination remediated and remedial action permit obtained;

When is a RAO Issued (cont.) & Contamination Remains

4. Less than an Order of Magnitude Change
 - a. Levels in approved RAW changed $< 10X$ or;
 - b. Site subject to a final remediation document and the difference of the new standard and concentrations of remaining contamination is $< 10X$.

When is a RAO Issued (cont.) & Contamination Remains

5. RAO issued for an AOC while rest of site is undergoing remediation; or
6. The “exception” = “Soils-Only” RAO issued when ground water contamination remains from the site or AOC receiving the soil-only RAO

Miscellaneous

- All Department fees and oversight costs must be paid before RAO is issued.
- Under “Planned Real Estate Development Full Disclosure Act” – RAO for the entire site or portions of the site allows final transfer to occur.
- RAO includes a Covenant Not to Sue (CNS) by Operation of Law. Compliance with Remedial Action Permits required to maintain CNS benefits & prevent RAO revocation

How is a RAO Prepared Structured?

Attachment 1 – RAO Shell Document

- One “Shell Document” to insure consistent language
- Includes “selections” to customize RAO
- Includes 16 possible “Notices” based on site conditions and scope of RAO

How is a RAO Prepared Structured (cont.)?

RAO Format

- Addressee (Person Conducting the Remediation)
- Remedial Action Type (Extent of Remediation)
- Scope of Remediation (AOC vs. Entire Site)
- Location Identifiers
- LSRP Statements
- Conditions (2 possible)
- Notice Section
- LSRP Signature
- CCs